

DIRECT TESTIMONY OF

CRISTINA FREEMAN

ON BEHALF OF

DOMINION ENERGY SOUTH CAROLINA, INC.

DOCKET NO. 2019-387-A

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT POSITION.

A. My name is Cristina Freeman. My business address is 220 Operation Way, Cayce, South Carolina 29033. I am employed by Dominion Energy South Carolina, Inc. (“DESC” or the “Company”)¹ as Director of Customer Account Management.

Q. DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.

A. I am a December 1992 graduate of the University of South Carolina (USC-Columbia) where I earned a Bachelor of Arts Degree in Humanities and Social Sciences, with a major in Spanish and a minor in Business Administration. Upon graduation, I joined Cooper Power Tools, Inc., in Lexington, S.C., as an International Customer Service Representative from

¹ For the purpose of my testimony, references to DESC also include Dominion Energy Services, Inc., which is an affiliate of DESC and employs certain personnel that may also receive and maintain customer data.

1 March 1993-February 1996, at which time I was promoted to bi-lingual
2 Supervisor, International Customer Service Department. In April 2005, I joined
3 SCANA Corporation, South Carolina Electric and Gas Company, as a bi-lingual
4 Customer Service Supervisor in the Cayce Customer Contact Center. In
5 September 2014, I was promoted to Manager, Customer Assistance Department.
6 In August 2019, I was also given responsibility for the management of business
7 office locations in Columbia, Charleston, Beaufort, and Warrentonville. In February
8 of 2022, I was promoted to my current role as Director of Customer Account
9 Management. In this role, I am responsible for the operation and oversight of
10 DESC's three Customer Contact Centers, as well as oversight for DESC's
11 Customer Assistance Department. I have over 27 years of Customer Service
12 experience, with 18 years in a supervisory role.

13
14 **Q. PLEASE BRIEFLY SUMMARIZE YOUR DUTIES WITH THE**
15 **COMPANY.**

16 A. In my former role as a bi-lingual Supervisor, I was responsible for
17 managing a team of 14-16 Customer Service Representatives and supporting
18 daily Customer Contact Center operations. This included assisting with
19 customer account related inquiries, such as billing, credit action, and service
20 orders for customers in both English and Spanish. Upon promotion to Manager
21 of Customer Assistance, I was responsible for the implementation and
22 administration of customer assistance programs designed to assist all customers,

1 with a primary focus on those that are low-income, persons with disabilities,
2 senior citizens, veterans, and households with medical equipment reliant on
3 electricity. I also identified, provided, and supported opportunities for
4 community engagement through participation in community outreach events and
5 served as the Special Needs Coordinator as part of the Emergency Recovery
6 Team during major storm or emergency events. In my current role as Director
7 of Customer Account Management, I oversee DESC's customer assistance
8 programs and am responsible for the daily operation of DESC's three Customer
9 Contact Centers located in Cayce, South Carolina, Charleston, South Carolina,
10 and Gastonia, North Carolina.

11
12 **Q. HAVE YOU PREVIOUSLY APPEARED BEFORE THE PUBLIC**
13 **SERVICE COMMISSION OF SOUTH CAROLINA ("COMMISSION")?**

14 A. Yes, I have appeared in numerous dockets before the Commission,
15 including DESC's rate case in Docket No. 2020-125-E.

16
17 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
18 **PROCEEDING?**

19 A. The principal purpose of my testimony is to explain how, on a day-to-day
20 basis, DESC follows its proposed Implementation Guidelines for Utility
21 Customer Data (the "Guidelines") and, in so doing, complies with the
22 Commission Regulation 103-823.2, which governs the protection of customer

1 data that is in the custody of a public utility. As part of this testimony, I explain
2 why customers share data with DESC, the nature of the information shared, and
3 how DESC safeguards such information.
4

5 **Q. HAVE YOU INCLUDED AN EXHIBIT WITH YOUR TESTIMONY?**

6 A. Yes. Exhibit No. __ (CF-1) contains the Guidelines.
7

8 **Q. PLEASE EXPLAIN THE COMMISSION REGULATION ENTITLED**
9 **“103-823.2, PROTECTION OF CUSTOMER DATA.”**

10 A. As explained in DESC’s transmittal letter that was filed in this docket in
11 support of the Guidelines on November 23, 2021, Commission Regulation 103-
12 823.2 governs the protection of customer data that is in the custody of a public
13 utility. Specifically, the regulation addresses items such as access and use of
14 customer data. As a public utility in the State of South Carolina, DESC is
15 required by the regulation to develop and seek Commission approval of
16 guidelines for implementation of this regulation. As a result, DESC timely filed
17 the Guidelines for Commission approval in this docket on November 23, 2021.
18

19 **Q. PLEASE BRIEFLY EXPLAIN HOW THE GUIDELINES RELATE TO**
20 **THE DOMINION ENERGY, INC. PRIVACY NOTICE REFERENCED**
21 **IN THE GUIDELINES.**

1 A. The Privacy Notice was developed and implemented by Dominion
2 Energy, Inc. (“Dominion Energy”) and represents an enterprise-wide
3 commitment to safely and securely handling customer data. Given that
4 Dominion Energy operates across several states, the Privacy Notice was
5 developed as a high-level document meant to be generally applicable across
6 Dominion Energy’s service territories. As such, certain provisions may apply in
7 particular states, and not in others.

8 On the other hand, the Guidelines represent DESC-specific practices
9 regarding customer data and were developed in response to Commission
10 Regulation 103-823.2. DESC seeks approval of these Guidelines, which will be
11 the primary provisions governing DESC’s handling of customer data.

12
13 **Q. IS YOUR DEPARTMENT THE PRIMARY GROUP AT DESC THAT**
14 **RECEIVES CUSTOMER DATA?**

15 A. Yes. As part of the Customer Service Department, the Customer Account
16 Management team is the primary point of contact for our customers. Customers
17 who wish to initiate service or take advantage of certain Commission-approved
18 customer programs or offerings work with the Customer Account Management
19 team to initiate their participation. This department is therefore the primary
20 group at DESC that receives customer data. As described below, the data that
21 DESC receives from customers is necessary to provide the product(s) and
22 service(s) requested by the customer. For example, customers seeking to initiate

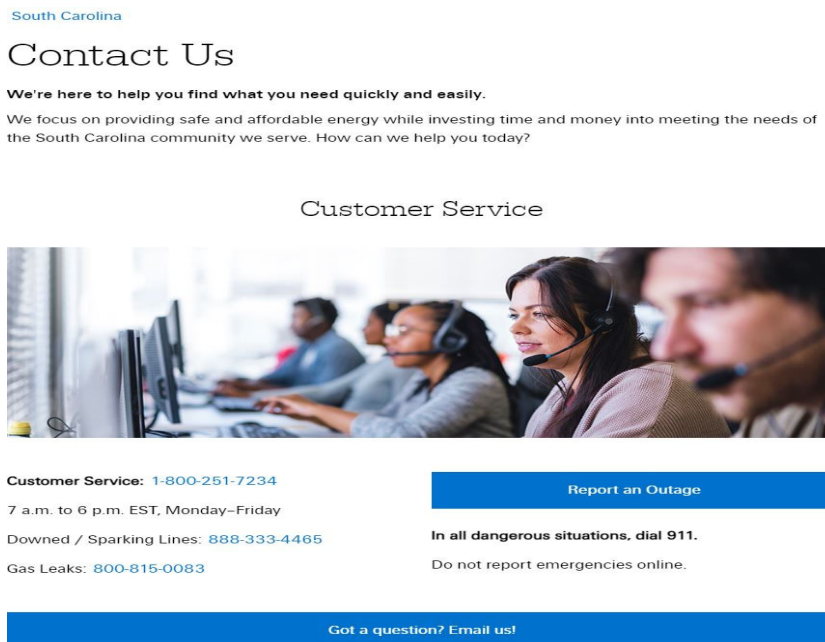
1 electric or gas service must provide DESC certain practical information, such as
2 the physical location where the customer would like to receive such service.
3 Likewise, customers seeking to receive outage alerts via text message must
4 provide DESC a phone number capable of receiving text messages to enroll in
5 those alerts. Although other industries may collect a broad range of data
6 unrelated to the product or service offered, DESC's practice is to limit any
7 information received from customers to that which is necessary to provide
8 Commission-approved products and services.

9
10 **Q. PLEASE DESCRIBE THE CUSTOMER SERVICE DEPARTMENT'S**
11 **EXPERIENCE WITH THE PRACTICES EXPLAINED IN THE**
12 **GUIDELINES.**

13 A. The Guidelines detail DESC's proposal for handling and maintaining
14 customer data in accordance with the Commission's regulations. The Customer
15 Service Department's current practice with regard to customer data is to follow
16 the Guidelines as proposed. Given that my department carries out the day-to-day
17 handling and safeguarding of customer data, my department will be primarily
18 responsible for executing the Guidelines once approved by the Commission. As
19 such, I am familiar with the Commission's requirements and the proposed
20 Guidelines.

Q. PLEASE BRIEFLY DESCRIBE HOW CUSTOMERS MAY CHOOSE TO PROVIDE YOUR DEPARTMENT WITH THEIR DATA.

A. Customers can provide information to DESC's Customer Service Department in numerous ways, including through a self-service web portal, email, and telephone. Each of these contact methods is available to DESC customers on the homepage of DESC's Customer Service Department, as shown below:



Q. DOES DESC PLACE ANY RESTRICTIONS ON THE AMOUNT OF PERSONAL DATA THAT CUSTOMERS PROVIDE?

A. Yes. As required by Commission Regulation 103-823.3(H)(2)(c), Section 4(c) of the Guidelines describes the limitations DESC places upon the receipt of customer data. Specifically, DESC's practice is to limit any customer data

1 received by DESC only to what is “adequate, relevant, and reasonably necessary
2 in relation to the purposes for which such data is collected and utilized.” In
3 practice, this means that DESC receives customer information that is required to
4 provide the customer with its products and services.

5
6 **Q. IN WHAT WAYS DOES DESC UTILIZE CUSTOMER DATA?**

7 A. The primary purpose of receiving such data is to ensure that DESC can
8 provide customers with the regulated products and services they’ve requested,
9 in a safe and reliable manner. For example, customer data such as address and
10 financial information is critical in serving customers. This type of information
11 allows DESC to, among other things, verify the customer’s identity to ensure
12 that the customer has the authority to manage the account, provide the products
13 and services requested by the customer, and bill the customer’s account.

14 Likewise, receiving information such as contact information and location
15 information from customers ensures that DESC is able to communicate with
16 customers by, including, but not limited to, responding to customer questions,
17 promptly notifying customers of outages or major storms, and notifying
18 customers of changes that may affect their requested products or services. DESC
19 may also utilize information provided by customers to market Commission-
20 approved products and services to customers, such as demand-side management
21 programs.

1 Although my department's day-to-day experience with customer data
2 arises from interactions with customers, I understand that DESC also uses
3 certain customer data for other purposes as well—such as system planning. As I
4 stated, my department does not participate in those broader planning activities,
5 but even in those situations, DESC's use of customer data is limited in scope and
6 related to the products or services provided to customers—which benefits
7 customers through improved service offerings and user experiences.

8
9 **Q. DOES DESC ALLOW CUSTOMERS TO SELECT HOW THEY CAN**
10 **PROVIDE DESC WITH CUSTOMER DATA?**

11 A. Yes, unless otherwise required by law to communicate in a certain
12 manner. Section 3(c) of the Guidelines ensures that customers can “indicate
13 preferences to DESC regarding communication means.” For example, customers
14 may specify that they would like to be contacted by DESC through email, or that
15 they would like to receive certain notifications through DESC mobile
16 applications. Alternatively, customers may opt-out of receiving certain
17 communications through certain channels (e.g., email, telephone, etc.). In this
18 way, customers are able to control the ways in which DESC is able to contact
19 them. However, there are certain products and services that necessitate specific
20 communication methods. For example, customers requesting to participate in e-
21 billing must provide a valid email address, while customers requesting to receive
22 certain outage notifications must consent to automated phone alerts.

1

2 **Q. WHAT IS DESC'S PRACTICE REGARDING THE SALE OF**
3 **CUSTOMER DATA?**

4 A. DESC's standard practice, as reflected in the Guidelines, prohibits the
5 sale of customer data. However, DESC may share (not sell) customer data in
6 certain situations with trusted third parties, such as a community action agency
7 attempting to assist a customer with bill payment. In those situations, DESC's
8 practice is to share customer data only as allowed by the law and the Guidelines.

9

10

NOTICE TO CUSTOMERS

11 **Q. ONCE APPROVED, WILL DESC MAKE THE GUIDELINES**
12 **AVAILABLE TO CUSTOMERS?**

13 A. Yes. Upon approval, the Guidelines will be made available to customers
14 via DESC's website to ensure transparency in DESC's data-handling practices.

15

16 **Q. WILL DESC ALSO MAKE THE PRIVACY NOTICE AVAILABLE TO**
17 **CUSTOMERS?**

18 A. Yes. Section 7 of the Guidelines outlines the "practices and procedures to
19 provide initial and annual notification of [DESC's] privacy policy to its
20 customers" as required by Commission Regulation 103-823.2(H)(2)(f). DESC
21 will notify customers of the Privacy Notice in a number of ways. For example,
22 new utility customers will be notified of the Privacy Notice in an initial

1 “welcome packet.” Additionally, DESC will provide a link to the Privacy Notice
2 on customer billing statements. Finally, the Privacy Notice will be posted on
3 DESC’s website.

4
5 **Q. DOES DESC ALLOW CUSTOMERS TO ACCESS THEIR CUSTOMER**
6 **DATA THAT IS HELD BY DESC?**

7 A. Yes. Commission Regulation 103-823.2(H)(2)(b) requires that DESC
8 “allow the customer to control access to customer data including processes for
9 customers to monitor, correct or limit the use of customer data.” Section 3(b) of
10 the Guidelines outlines these processes. At a high level, DESC will provide
11 information about a customer’s data held by DESC in its Customer Information
12 System (“CIS”), as well as the customer’s energy usage data held by DESC,
13 upon request of that customer.

14
15 **Q. HOW CAN CUSTOMERS VIEW THE DATA HELD IN THE CIS?**

16 A. Customers can contact the Customer Service Department or email
17 privacy@dominionenergy.com to request this information, which typically
18 consists of things like contact information, driver’s license number, and location
19 information. Upon review of that information, the customer can also request that
20 DESC correct any inaccuracies as well.

Q. HOW CAN CUSTOMERS VIEW THE ENERGY USAGE DATA HELD BY DESC?

A. Customers can view the energy data held by DESC in a number of ways. These options are listed on the home page of DESC's "Usage Data" website, which is shown below:

South Carolina

Usage Data

You have convenient and secure access to your Dominion Energy usage data. There are several ways for you to easily access this information. *Usage data for 24 months is available.

Residential & Commercial Customers

- **Website** – <https://account.dominionenergysc.com> and with the Dominion Energy app
- **Email** – SCContactUs@DominionEnergySC.com
- **Call** – 800-251-7234

** We do not send usage data to third parties.*



Although various options are available to customers, DESC's secure website is the primary way in which customers can log-in, view, and obtain copies of their utility usage data from DESC.

By accessing their energy usage data, customers are able to see their usage patterns over the past 24 months—such as when the customer consumed higher amounts of electricity. As I mentioned, DESC's practice is to never sell data to third-parties, but DESC may provide energy usage data to certain third

1 parties—unless instructed otherwise by the customer—that offer services or
2 products that may be beneficial to the customer. DESC utilizes the same
3 stringent protection measures with respect to this data as it does for the customer
4 information I mentioned above (i.e., personal identifiers).

5
6 **CUSTOMER CONSENT**

7 **Q. WHAT DOES IT MEAN FOR A CUSTOMER TO PROVIDE ITS**
8 **CONSENT UNDER THE GUIDELINES?**

9 A. In this context, consent typically refers to whether a customer permits
10 DESC to use their customer data in a specific way.

11
12 **Q. HOW CAN A CUSTOMER PROVIDE THIS CONSENT?**

13 A. The primary way for a customer to provide consent is through written or
14 verbal communication with one of DESC's Customer Service Representatives.
15 In other instances, consent may be received electronically by DESC. These
16 interactions are documented by DESC.

17
18 **Q. DO CUSTOMERS HAVE THE OPTION TO WITHHOLD CONSENT?**

19 A. Yes. Customers do have the option to opt-out of sharing certain
20 information or receiving certain communications from DESC. The options
21 available to customers, as well as the ways in which customers can grant or
22 modify consent, are outlined in the Guidelines. However, as described above,

1 there are certain products and services which require that the customer consent
2 or provide certain communication preferences to obtain such products and
3 services. For example, if a customer wants to participate in e-billing, the
4 customer must consent to be contacted via email at a valid email address.

5
6 **PROTECTION OF CUSTOMER DATA**

7 **Q. DO ALL DESC EMPLOYEES HAVE ACCESS TO CUSTOMER DATA?**

8 A. No. Only employees who have a business need and have been trained
9 accordingly are granted access to the CIS, which houses the customer data
10 received by DESC.

11
12 **Q. PLEASE DESCRIBE HOW JOB FUNCTIONS ARE IDENTIFIED AS**
13 **HAVING A “BUSINESS NEED.”**

14 A. DESC reviews and evaluates specific department responsibilities, as well
15 as specific job duties within that department, to determine the extent, if any, to
16 which certain DESC personnel require access to customer data to perform their
17 duties. Even where DESC determines that access is required, DESC grants levels
18 of access to customer data based upon the employee’s identified business need.
19 This level of access is monitored in accordance with Section 6 of the Guidelines.

1 **Q. WHAT TYPE OF TRAINING MUST THESE EMPLOYEES**
2 **COMPLETE PRIOR TO OBTAINING ACCESS TO CUSTOMER**
3 **DATA?**

4 A. As required by Commission Regulation 103-823.2(H)(2)(e), Section 6 of
5 the Guidelines outlines the training provided to DESC employees related to
6 customer data. DESC implements specific training requirements for the
7 Customer Service Department given its day-to-day handling of customers' data.
8 Prior to obtaining access, employees in the Customer Service Department are
9 required to complete training aligned with the level of access needed for their
10 job function. After training is completed, these employees are presented with
11 self-dealing policies and are required to certify they understand and agree to
12 abide by them. These policies add an additional layer of protection to customer
13 data by prohibiting employees from making any additions or changes to their
14 account, or accounts of family members or friends. DESC periodically evaluates
15 the type of customer data viewed by each employee to ensure these policies are
16 adhered to on a case-by-case basis.

17
18 **Q. DOES DESC TRAIN THESE EMPLOYEES ON ITS CUSTOMER**
19 **INFORMATION POLICIES AND PRACTICES?**

20 A. Yes. All employees that are granted access to the CIS are trained on these
21 policies and practices prior to obtaining access. Additionally, Contact Center
22 Agents are required to complete a refresher computer-based training twice a year

to ensure they understand customer information policies, including the Guidelines. All users of the CIS are also presented with the relevant customer information policies prior to each log-in. In order to access the CIS, users must first agree to abide by all such policies. A screenshot of that log-in screen is immediately below:

CIS

Login to the Dominion Energy Customer Information System

Terms Of Use
 Dominion Energy's Customer Information System contains confidential customer and proprietary information. It may only be accessed for a legitimate business purpose, and the Customer Information Privacy policy must be adhered to. Dominion Energy's Code of Conduct and self-dealing policy prohibit employees from transacting business on their personal accounts. Employees are also prohibited from transacting business on the accounts of relatives, friends or other personal or business affiliates. Note that account access by employees is monitored to ensure compliance with these Dominion Energy policies.

Login
 Company
 UserName
 Password
☐ I agree to the terms of use.
☐ Turn on softphone
 Login

As you can see, users are consistently provided with the restrictions and practices applicable to the use of the CIS.

Q. DOES DESC MONITOR ACCESS OF CUSTOMER INFORMATION BY DESC EMPLOYEES?

A. Yes. As described in Section 6 of the Guidelines, employee access to the CIS is monitored, and employee access is also audited on a monthly and annual basis to ensure compliance with DESC's information practices. The monthly

1 audit focuses primarily upon any changes in job titles or functions to determine
2 whether a modification of access rights is required. The annual audit is a
3 complete review of all employees with access to the CIS and ensures that an
4 employee's supervisor or similar line of leadership specifically reviews and
5 approves the level of access for that employee. In the event that an employee has
6 changed positions or no longer requires a certain access level, the access rights
7 afforded to that employee will be modified or revoked.

8
9 **DATA SECURITY MEASURES**

10 **Q. PLEASE DESCRIBE THE DATA SECURITY MEASURES DESC USES**
11 **TO PROTECT CUSTOMER DATA.**

12 A. Section 5 of the Guidelines explains the Data Quality and Security
13 measures required by Commission Regulation 103-823.2(H)(2)(d). DESC
14 maintains a number of security practices—both electronic and physical—to
15 protect customer data from unauthorized access or misuse. As for physical
16 security measures, employees can only access the Customer Contact Center if
17 they have been granted “badge access” to the building, as determined through
18 the business-need analysis described above. With respect to hard copies of
19 documents that may contain customer data in the Customer Contact Center,
20 DESC employees are trained to either keep these documents under lock and key
21 at their desk or shred those documents once they are no longer required.

1 Although I am not directly responsible for applying electronic security
2 measures on a day-to-day basis, Section 5(a)(i) of the Guidelines outlines the
3 various tools utilized by DESC for electronic security, including 24x7
4 monitoring. I can confirm for the Commission that DESC applies electronic
5 security measures in accordance with its Guidelines.
6

7 **Q. HOW DOES DESC ENFORCE COMPLIANCE WITH THE**
8 **GUIDELINES?**

9 A. DESC designates a chief compliance officer who is responsible for
10 compliance with DESC's customer data protection regulations. The chief
11 compliance officer's name is posted on the DESC website (internal and
12 external), and this person will take the lead on matters related to compliance with
13 these practices, whether it be internal reviews, spot checks, or scheduled periodic
14 evaluations of the Guidelines.
15

16 **Q. PLEASE IDENTIFY THE CONTROLS IMPLEMENTED BY DESC TO**
17 **ENFORCE COMPLIANCE WITH THE GUIDELINES.**

18 A. DESC utilizes several controls in addition to the audits and monitoring I
19 mentioned above. Section 6 of the Guidelines notes that compliance personnel
20 at DESC may perform periodic evaluations to determine whether employees and
21 contractors are complying with DESC's customer information practices. If an

1 employee is found to have violated any of these practices, the Guidelines provide
2 for disciplinary action, up to and including termination.

3
4 **THIRD-PARTY ACCESS TO CUSTOMER DATA**

5 **Q. DO THE GUIDELINES DESCRIBE THE WAYS IN WHICH DESC**
6 **SHARES CUSTOMER DATA WITH THIRD PARTIES?**

7 A. Yes. As required by Commission Regulation 103-823.2(H)(2)(g), Section
8 of the Guidelines outline DESC's standard practices with respect to sharing
9 customer data with third parties.

10
11 **Q. UNDER WHAT CIRCUMSTANCES DOES DESC SHARE CUSTOMER**
12 **DATA WITH THIRD-PARTIES?**

13 A. DESC understands how important privacy is to its customers. As such, in
14 accordance with Section 8(a) of the Guidelines, DESC's practice is to share
15 customer data only as allowed by the law and the Guidelines. Additionally, as I
16 stated above, DESC never sells customer information.

17
18 **Q. WHAT MEASURES DOES DESC TAKE TO ENSURE THESE THIRD-**
19 **PARTIES PROVIDE APPROPRIATE PROTECTIONS FOR**
20 **CUSTOMER DATA?**

21 A. When DESC does make a permitted disclosure of customer data to a
22 third-party, DESC requires that the third party implement acceptable data

1 protection measures. These are outlined in Section 8(c) of the Guidelines, and
2 ensure that the third-party implements acceptable data protection measures.
3

4 **CONCLUSION**

5 **Q. WHAT IS DESC REQUESTING THE COMMISSION TO DO IN THIS**
6 **PROCEEDING?**

7 A. DESC respectfully requests that the Commission approve the Guidelines
8 as presented by DESC in its filing on November 23, 2021. The Guidelines
9 employ measures to ensure that customer data is protected and received only
10 when such data is required to provide products or services requested by
11 customers. The Guidelines also implement a framework to ensure that permitted
12 third-parties implement stringent protections as well. Therefore, DESC believes
13 the Guidelines fulfill the Commission's regulations and respectfully request
14 approval of the same.
15

16 **Q. DOES THIS CONCLUDE YOUR PREFILED DIRECT TESTIMONY?**

17 A. Yes.